



**Government of the Republic of Trinidad and Tobago**  
**Office of the Attorney General and Ministry of Legal Affairs**

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**ANTI - TERRORISM UNIT**

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# Annual Report

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2022-2023

ANTI-TERRORISM UNIT  
OFFICE OF THE ATTORNEY GENERAL AND MINISTRY OF LEGAL AFFAIRS

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## Annual Report

### 1.0 STATUTORY REMIT

The Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit of Trinidad and Tobago) Act, 2018, assented to on December 31, 2018, amended the Anti-Terrorism Act, Chapter 12:07 which provides in Part IIA, Section 38C(1) that the Attorney General shall, within three (3) months after the end of each year, cause a report with respect to the performance of his functions under this Act to be prepared.

(2) The Report shall contain such statistical and other information as the Attorney General thinks fit in relation to –

- (a) Court Listings;
- (b) International Cooperation;
- (c) Forfeitures; and
- (d) Such other matters as the Attorney General considers necessary.

(3) The Attorney General shall cause a copy of the report to be laid before both Houses of Parliament within one (1) month after its completion.

### 2.0 DEPARTMENT OVERVIEW

#### 2.1 About the Unit

The Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit of Trinidad and Tobago) Act, 2018, assented to on December 31, 2018, amended the Anti-Terrorism Act, Chapter 12:07 which *inter alia* made provision for the establishment of an Anti-Terrorism Unit.

Part IIA, Section 38B of the Anti-Terrorism Act, Chap. 12:07 (hereinafter referred to as “the Act”) provided for the establishment of the Anti-Terrorism Unit in the Office of the Attorney General and Ministry of Legal Affairs (hereinafter referred to as the “ATU”).

The primary function of the ATU is to fulfil the obligations of the Attorney General pursuant to the Act. Section 38B(2) provides that the functions of the Attorney General under the Act may be exercised by the Attorney General in person or through a public officer or legal officer who is—

- (a) employed in the Unit;
- (b) authorised by the Attorney General in writing; and
- (c) acting under and in accordance with the general or special directions of the Attorney General.

### **2.1.1 Department Structure and Functions**

The ATU is comprised of the following positions established via Cabinet Note (Cabinet Minute No. 1324 of June 27, 2019 and Cabinet Minute No. 1731 of August 22, 2019 refer):

- Head
- Two (2) Senior Legal Counsel
- Two (2) Legal Counsel II
- One (1) Legal Counsel I
- One (1) Paralegal
- One (1) Business Operations Assistant II

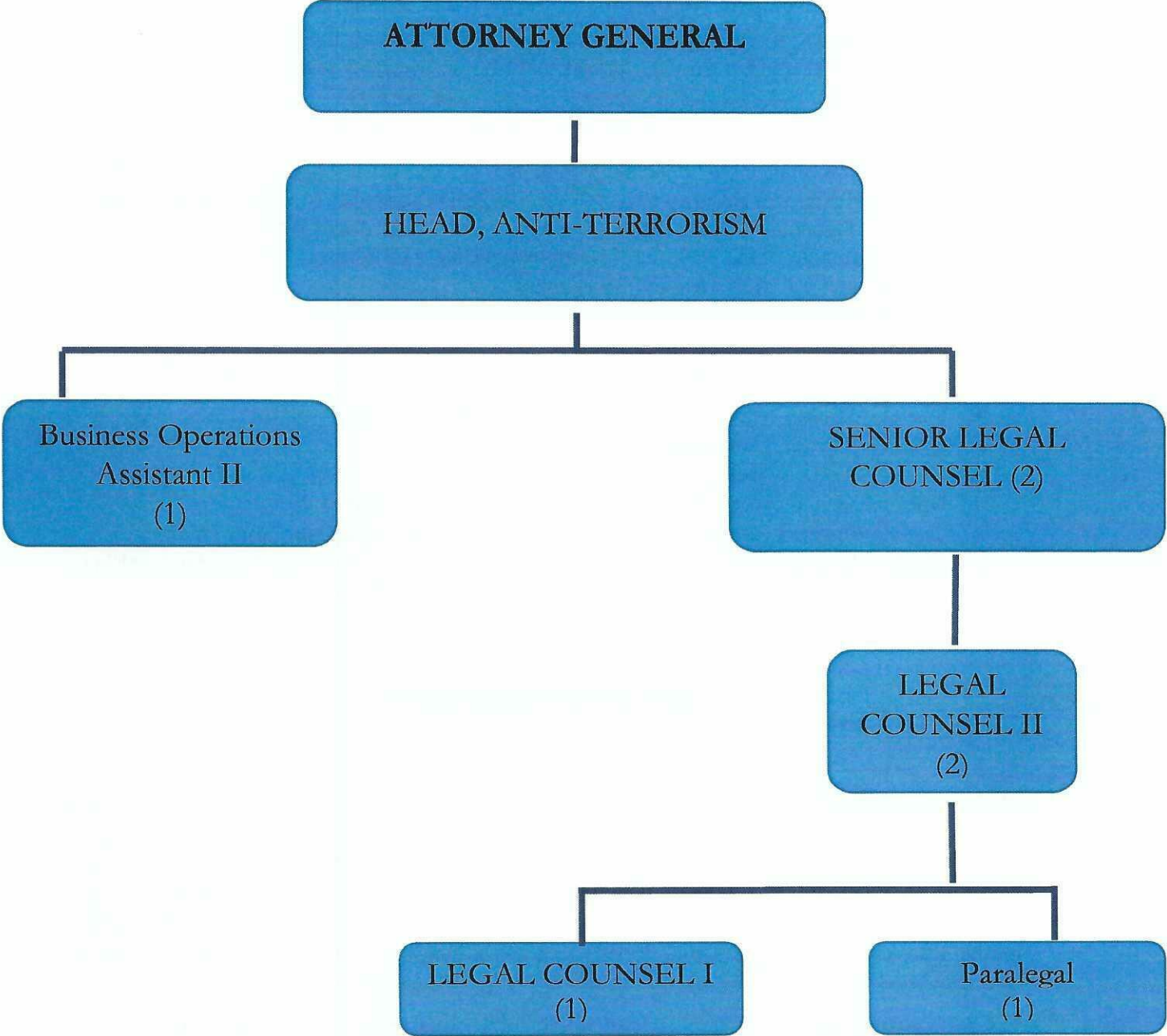
The ATU was established in July 2019 in order to efficiently carry out Trinidad and Tobago's international obligations pursuant to the United Nations Security Council Resolutions (UNSCRs) and the Financial Action Task Force (FATF) Standards, coupled with the growing global threat of Terrorism and Terrorism Financing, as well as the security issues faced by the jurisdiction (specifically in relation to Foreign Terrorist Fighters (FTFs)).

Of utmost importance in respect of the aforementioned are the amendments made to the Act in 2018, pursuant to which the Attorney General has numerous responsibilities. The ATU, *inter alia*, provides an essential role in fulfilling these obligations as provided for in the Act.



2.1.2 Organisational Chart

Anti-Terrorism Unit:



### **2.1.3 Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) Compliance Unit:**

Pursuant to Cabinet Note No. AGLA (20)102 and Cabinet Minute No. 1113 of 2020, Cabinet approved the transfer of the Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) Compliance Unit from the Ministry of National Security to the Office of the Attorney General and Ministry of Legal Affairs under the purview of the ATU.

The AML/CFT Compliance Unit (Cabinet Minute No. 823 dated April 8, 2010 refers), established in the Ministry of National Security provided support to Trinidad and Tobago's Prime Contact to the Caribbean Financial Action Task Force (CFATF) and the CFATF Secretariat. The organisational structure of the AML/CFT Compliance Unit is as follows:

- One (1) Senior Policy Adviser (Operations)
- One (1) Policy Adviser (Operations)
- One (1) Business Intelligence Analyst
- One (1) Senior Legal Officer (formerly designated Senior Legal Executive)
- One (1) Driver/Courier (formerly designated Office Courier);
- One (1) Director, Compliance
- One (1) Interface Security Officer
- One (1) Legal Officer II (formerly designated Legal Executive)
- One (1) Business Operations Assistant I (formerly designated Operations Officer)
- One (1) Hospitality Attendant (formerly designated Housekeeping Attendant) (Minutes No. 823 of April 8, 2010 and No. 2763 of October 13, 2011 refer)

## **3.0 PERFORMANCE REPORTING**

### **3.1 Core Objectives**

The core objective of the ATU is to efficiently carry out the functions of the Attorney General pursuant to the Act. Primarily, the ATU continuously implements Section 22B of the Act by making applications to the High Court for the designation of individuals and entities, both domestically and detailed on various United Nations Security Council (UNSC) Sanctions Lists, and the application of Targeted Financial Sanctions. The term Targeted Financial Sanctions (TFS) means both asset freezing and prohibitions to prevent funds or other assets from being made available, directly or indirectly, for the benefit of designated persons and entities.

The ATU also works closely with key national agencies relative to Counter-Terrorism matters as well as with our international partners. Measures to freeze terrorist funds or other assets may complement criminal proceedings against a designated person or entity, but are not conditional upon the existence of such proceedings. The measures serve as a preventive or disruptive tool when criminal proceedings are either not possible or not practical. This does not of course prevent freezing procedures as such forming a part of criminal procedures.



Vital to the role of the ATU and the fulfilment of our obligations are the international standards in respect of countering terrorism imposed on Trinidad and Tobago as a member state of both the United Nations and CFATF. The effective implementation of these obligations by the ATU requires institutional arrangements allowing for close co-ordination among financial, intelligence and law enforcement authorities and the incorporation of the measures into the country's broader counter-terrorism policy. The ATU has in place procedures to protect all sources of information, including intelligence and closed-source materials, used in the designation of persons and entities as being subject to the asset freeze measures. In the execution of these obligations, the ATU works closely with both the CFATF and the Financial Action Task Force (FATF).

### **3.2 Activities and Achievements**

1. The ATU, formerly the Anti-Terrorism Desk, has worked rigorously towards fulfilling our obligations pursuant to the Act and international standards. In so doing, the ATU has designated **all** individuals and entities on the UNSC 1267(1999) (*ISIL (Da'esh) & Al-Qaida*) Sanctions List and the UNSC 1988(2011) (Taliban) Sanctions List. In addition, nine (9) individuals have been designated domestically pursuant to UNSCR 1373(2001).
2. Following the granting of the aforementioned Orders by the High Court, the ATU conducts six-monthly reviews (as of the date upon which each Order is granted), in respect of each Order and when necessary, makes applications to the Court for de-listings pursuant to section 22B(9) of the Act.
3. To date, the ATU has obtained a total of one hundred and fifty-one (151) Orders of the High Court pursuant to section 22B of the Act, with a total of four hundred and ninety-one (491) individuals and entities currently designated as listed entities and their assets frozen.
4. Continuous implementation of the Anti-Terrorism Act, Chap. 12:07:
  - For the period January 2023 to December 2023, five (5) individuals and entities were declared listed entities and their assets ordered frozen and two (2) individuals and entities were delisted and their assets were unfrozen.

• **Table 1: Annual Listings and Delistings**

UNSCR	Year/s	No of Listed entities & individuals	# of Court Orders
1267(1999) 1989(2011) 2253(2015) 2368(2017)	2015/2016	78	8
	2016/2017	258	60
	2017/2018	20	11
	2018/2019	8	8
	2020	9	7
	2021	4	4
	2022	1	1
	2023	4	4
1988(2011)	2018/2019	140	7
1373(2001)	2015	1	1
	2017	5	5
	2020	1	1
	2021	1	1
	2023	1	1
Delistings ATA Section 22B(9)	2018/2019	- 22	15
	2020	-3	3
	2021	-3	3
	2022	-11	10
	2023	-2	1
<b>Total</b>	<b>2015 -2023</b>	<b>491</b>	
<b>Total Number of Court Orders granted</b>			<b>150</b>

5. The ATU also implements TFS related to Proliferation of Weapons of Mass Destruction to meet our international obligations pursuant to FATF Recommendation 7 and Immediate Outcome 11, as well as the mandates of UNSCR 1718(2006) and 2231(2015). It is recognised that the use of TFS is an important means to deprive proliferation financiers of their funds, thereby protecting citizens from the threats of crime, terrorism and weapons of mass destruction. As such, these measures are continuously maintained and applied so as to financially disrupt and guard against potential proliferation financing attempts.
6. In order to meet the mandates of UNSCR 2653(2022) and the UNSC Sanctions Regime on Haiti, which relates to the Program of Action (POA) to prevent, combat and eradicate the illicit trade in small arms and light weapons, the Economic Sanctions (Implementation of United Nations Security Council Resolution 2653(2022) on the Republic of Haiti) Order, 2023 was established pursuant to the Economic Sanction Act, Chap. 81:05. In alignment with the GORTT's commitment towards doing its part to ensure the restoration of peace, security and stability for Haiti by upholding the implementation of this UNSCR, the ATU has since applied to the High Court for Orders to designate all five (5) individuals on the UNSC 2653 Sanctions List and have their assets frozen. The relevant orders were successfully granted and TFS have been implemented.



7. Additionally, the ATU has continued to deliver training to law enforcement and competent agencies on the provisions of the Anti-Terrorism Act, Chap. 12:07, with particular emphasis on terrorism offences, terrorist financing and confiscation of terrorist funds and the terrorist financing risks related to Non-profit Organizations. Following the enactment of the Anti-Terrorism (Amendment) Act, 2018 in July 2018, this training has been updated to reflect the newly amended provisions of the Act. Priority has been given to those agencies directly involved and operational in the gathering of intelligence and evidence for the investigation of terrorism and terrorist financing matters with more than eight hundred (800) individuals having been trained to date. In addition, the Anti-Terrorism Unit has conducted training at forums which were participated in via teleconference and videoconferences, thereby disseminating the relevant information to regional audiences in CARICOM, as well as International Participants.
8. Further to the foregoing, the ATU also assists key Committees, Task Forces and other forums in Trinidad and Tobago in understanding the provisions of the ATA and their roles and mandates in the context of same. In this regard, members of the ATU deliver presentations on relevant topics specifically tailored to focus on matters at hand and its applicability to the provisions of the ATA, the wider AML/CFT/CPF regime in Trinidad and Tobago and our international obligations.
9. The ATU has taken the lead in coordinating training for key entities in Trinidad and Tobago in respect of Virtual Assets (VAs) and Virtual Asset Service Providers (VASPs). The pending training will be facilitated by the Global Programme against Money Laundering, Proceeds of Crime and the financing of Terrorism (GPML), United Nations Office on Drugs and Crime (UNODC). The GPML workshops will focus generally on developing a framework for the licencing of VAs and VASPs and the implementation of TFS. In furtherance of the foregoing, the GPML, UNODC is tentatively carded to visit Trinidad and Tobago in February 2024 to engage with the ATU and other key entities to render technical assistance. This cooperation and assistance remains an ongoing process for the ATU.
10. The Returnee Bill, 2023 is in the process of being finalized. This matter is being given priority as the GORTT recognises the potential impact of persons returning to and entering the jurisdiction from areas of conflict having endured exposure to extreme violence and hardship. This threat is further exacerbated by the fact that persons entering and returning may have gained terrorist related military training and expertise. The GORTT is cognizant of this situation and is working with all stakeholders to ensure that this crisis is determined in the best interest of all citizens of Trinidad and Tobago. The GORTT recognizes its responsibility in balancing the needs of individuals against the interests of national security. In so doing, the GORTT will ensure that all measures provided for within the proposed legislation, are subject to due process and judicial oversight.
11. In alignment with the GORTT's commitment to improving border management, counter-terrorism and combat drug trafficking and human trafficking, the ATU, other departments



within the Office of the Attorney General and Ministry of Legal Affairs as well as other key entities in Trinidad and Tobago have been working in tandem with the CARICOM Implementation Agency for Crime and Security (IMPACS) through funding from the 11<sup>th</sup> European Development Fund to develop updated model Advanced Passenger Information and Passenger Name Record (API/PNR) legislation. This important initiative, with the CARICOM IMPACS, is on-going wherein consultative meetings are held to vet the *draft* legislation to ensure it is functional and consistent within Trinidad and Tobago's existing legislative framework. Also, under revision are guidance documents outlining the requirements to implement the API/PNR legislation within the jurisdiction and at the CARICOM IMPACS through the sub-agency of the Joint Regional Communications Centre (JRCC).

12. The Miscellaneous Provisions (FATF Compliance) Act, No. 25 of 2020 assented to on December 18, 2020, provides as follows:

- Section 5(1) (a) - The Anti-Terrorism Act, Section 22B allows for applications to the High Court for the designation of individuals and entities, both in Trinidad and Tobago and elsewhere and as detailed on various UNSC Sanctions Lists, in the application of targeted financial sanctions regime. The ATU works closely with key national and international agencies relative to all CT matters. Section 22B is amended to provide that all applications made under Section 22B shall be filed under seal. This administrative measure provides for applications to the Court by the ATU and is necessary in order to protect any potential or likelihood of success for prosecutions against an individual or entity designated pursuant to Section 22B whereby the evidence relied upon in the respective application can play a substantial role in the laying of potential charge(s) by the Office of the Director of Public Prosecutions.
- Section 5(1) (c) - new Section 44: a summary offence for persons who are currently employed or have been previously employed in the ATU who knowingly or recklessly disclose confidential information, which they have obtained as a result of such employment.

13. Further to the foregoing, Trinidad and Tobago is in the process of finalising the Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism, Financial Intelligence Unit of Trinidad and Tobago, Securities, Insurance, Non-Profit Organisations and Miscellaneous Provisions [FATF Compliance]) Bill, 2023. In this regard, the ATU plays an essential role in the revision of legislation, policies and procedures relative to rectifying deficiencies in our AML/CFT Framework to meet the FATF Standards.

14. Additionally, the ATU is working closely with other entities to drive a suite of amendments to legislation to meet our international obligations as set out by the Global Forum on Transparency and Exchange of Information for Tax Purposes via the Miscellaneous Provisions (Trustees, Exchequer and Audit Act, the Minister of Finance (Incorporation) Act, Proceeds of Crime, Income Tax, Companies, Partnerships, Securities, Tax Information Exchange

### 3.3. Ongoing Projects and Activities

1. Task Force Charlie - The key objective of Task Force Charlie (TFC) is to provide for efficient co-ordination of intelligence, operational and strategic analysis and parallel investigations relating to terrorism. An effective co-ordination will assist in the determination of matters pursued in accordance with various UNSCRs, particularly UNSCR 1267(1999) and 1373(2001). In order to implement the TFS regimes required under FATF Recommendation 6, including initiating, or making proposals for, designations, there is the need for the ATU to engage with a range of authorities (for example, Foreign Affairs, Immigration, Central Bank) and agencies (for example, security, intelligence, law enforcement, Financial Intelligence Unit (FIU)). The collaboration of information, intelligence and evidence and analysis of the aforesaid also has the potential to shed light on the likelihood of success for criminal prosecution in these matters and act as a steppingstone towards prosecution whereby successful applications are granted pursuant to *Section 22B* of the *Anti-Terrorism Act, Chap. 12:07*.
2. Six-monthly review of all High Court Orders pursuant to section 22B(9) of the Act.
3. Fulfilment of international obligations pursuant to FATF Standards, Recommendation 6 on targeted financial sanctions related to terrorism and terrorist financing and Recommendation 8, Non-Profit Organisations -
  - i. Daily checks of the UNSC's website and various sanctions lists to determine whether there are any additions and/or amendments;
  - ii. Listing and delisting applications where necessary; and
  - iii. Publication of Guidance and Notices to the Public.
4. The Office of the Attorney General and Ministry of Legal Affairs via the Anti-Terrorism Unit (ATU) has established Memorandums of Understanding (MOU) with Belize and Guyana and will to execute several Memorandums of Understanding (MOUs) to allow for greater regional collaboration on counter-terrorism matters. These MOUs are being utilised as mechanisms for efficient information exchange related to *inter alia* UNSCR 1373(2001) as it pertains to individuals and entities being considered for the application of TFS in accordance with Financial Action Task Force Recommendations 6 and 7.
5. Ongoing co-operation with our international partners:
  - a) British High Commission (BHC) and key Government departments in England and Wales;



- b) International Institute of Justice (IIJ) - the IIJ in collaboration with the BHC has been working assiduously with various entities in Trinidad and Tobago since 2018 to deliver training for members of the ATU, prosecutors, law enforcement and border/immigration officials on building prosecution cases against individuals or organizations engaged in terrorism-related offences;
  - c) United States Embassy and key Government departments of the United States of America - the United States of America often lends invaluable support to Trinidad and Tobago in the gathering of information and making applications in respect of CT matters;
  - d) FATF - Trinidad and Tobago continues to work closely with the FATF in respect of various processes in which the country has worked diligently to exit and generally in numerous AML/CFT matters such as training sessions, inclusive but not limited to:
    - i. Joint CFATF / FATF Assessors Training
    - ii. Counter-Financing of Terrorism (CFT) Training, November 2019
  - e) Commonwealth Secretariat - the ATU works closely with members of the Commonwealth Secretariat in relation to matters of Preventing and Countering Violent Extremism (P/CVE) and Counter Terrorism matters; and
  - f) The Global Programme against Money Laundering, Proceeds of Crime and the Financing of Terrorism (GPML), United Nations Office on Drugs and Crime (UNODC).
6. The ATU and Trinidad and Tobago at large continue to work closely with a number of our regional partners in the fight against Terrorism, namely:
- a) CARICOM IMPACS; and
  - b) CFATF.
7. Participation in various Committees in lending of expertise in respect of counter-terrorism matters arising therein:
- i. National Anti-Money Laundering and Countering the Financing of Terrorism Committee (NAMLC) established by Section 57A of the Proceeds of Crime Act, Chap 11:27, as amended by the Miscellaneous Provisions Act, No. 20 of 2018;
  - ii. Inter-Ministerial Committee on Countering Terrorism (IMCCT) in accordance with the National Counter-Terrorism Strategy of Trinidad and Tobago established in March 2018;
  - iii. Task Force Nightingale (TFN) on Repatriation and Reintegration of Trinidad and Tobago Nationals established in August 2018;
  - iv. Development of Policy on Declaring Geographical Areas pursuant to Section 15B of the Act;
  - v. Participation in the National Security Council Secretariat, Integrated Threat Assessment Centre, Resident Partnership Programme, Cycle 3, 2017 to 2019; and
  - vi. Participation in an Interagency Focus Group: Development of the **National Counter Terrorism Operations Plan** commenced on June, 30 2020 led by the



Chief of Defence Staff, Air Commodore Darryl Daniel, Chair of the Inter-Ministerial Committee on Counter Terrorism to the Heads of Security and the Minister of National Security.

- vii. The tripartite Inter-Ministerial Committee (IMC) on AML/CFT was re-established via Cabinet Minute No. 1667 of 2023 in preparation for the CFATF 5<sup>th</sup> Round Mutual Evaluation Process in the last quarter of 2023.
8. Participation in the CFATF Plenary and Working Group Meetings held twice per year (November-December 2022 and May 2023) and FATF Plenary and Working Group meetings held three times per year (February, June and October, 2023).
9. Ongoing training delivered by the Anti-Terrorism Unit, Office of Attorney General and Ministry of Legal Affairs to law enforcement agencies on the provisions of the Anti-Terrorism Act, Chap. 12:07, with particular emphasis on terrorism offences, terrorist financing and confiscation of terrorist funds. A Table detailing the various training sessions and relevant agencies are hereto attached as **Annex I**.
10. Implementation of UNSCR 1540(2004) – the ATU works jointly with other domestic agencies including the Ministry of Foreign and CARICOM Affairs to fulfill Trinidad and Tobago's obligations pursuant to UNSCR 1540(2004) which provides *inter alia*, that countries should refrain from taking part in proliferation related activities or providing any form of support to non-state actors that attempt to develop, acquire, manufacture, process, transport, transfer or use nuclear, biological, and chemical weapons and their means of delivery, in particular for terrorist purposes.
11. Continuous review of the Counter-Terrorism legislative framework and proposed amendments to the Anti-Terrorism Act, Chap. 12:07.
12. Oversight and participation in the conduct of a National Risk Assessment with technical assistance from the *World Bank Group*.
13. The ATU continues to work closely with the Ministry of Finance to establish the Civil Asset Recovery and Management Agency pursuant to section 9(2) of the Civil Asset Recovery and Management and Unexplained Wealth Act, 2019.

# ANNEX I

**TABLE OF TRAINING & EVENTS CALENDAR 2018 -2023**

No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
1.	Special Branch, TTPS	Presentation on the Anti-Terrorism Act, FTFs and International Obligations re CT & Confiscation of Terrorist Property	January 19, 2018	Agra Court, Agra Street St. James	Approx. 20	Completed
2.	Ministry of the Attorney General & Legal Affairs	Legal Aspects of Combatting Terrorism Course	March 14 – April 6, 2018	Defence Institute of International Legal Studies (DIILS) Newport, Rhode Island, USA	40	Completed
3.	International Justice & Rule of Law	Cross-Border and Returning Foreign Terrorist Fighter (RFTF) Training	March 19-23, 2018	Ministry of the Attorney General & Legal Affairs	40	Completed
4.	Exercise Fused Response 2018 Trinidad and Tobago Defense Force (TTDF), Trinidad and Tobago Police Service (TTPS)	Presentation on the Anti-Terrorism Act, FTFs and International Obligations re CT & Confiscation of Terrorist Property	April 16-27, 2018	Knowsley Building Port of Spain	40	Completed
5.	Financial Investigations Branch, TTPS	Presentation on the Anti-Terrorism Act, FTFs and International Obligations re CT & Confiscation of Terrorist Property	June 11, 2018	Financial Investigations Branch Trinidad and Tobago Police Service Riverside Plaza Port of Spain	19 (new recruits)	Completed



No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
6.	Trinidad & Tobago Defence Force	Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT& Confiscation of Terrorist Property	July 11, 2018	Camp Ogden- Long Circular Road	Approx. 30	Completed
7.	The Inter-Ministerial Committee on Countering Terrorism (IMMICCT)	Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT& Confiscation of Terrorist Property	July 19, 2018	Office of the Prime Minister, Victoria Avenue, Port of Spain	9	Completed
8.	Financial Investigations Branch, TTPS	1. NPO Sector Risk 2. Modes of Terrorism Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT& Confiscation of Terrorist Property	August 14 & 16, 2018	Besson Street Police Station, Riverside Plaza, Port of Spain	40	Completed
9.	Special Branch, TTPS	Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT& Confiscation of Terrorist Property	August 15, 2018	Agra Court, Agra Street, St. James	Approx. 20	Completed
10.	International Justice & Rule of Law <ul style="list-style-type: none"> <li>• OCIU</li> <li>• Cybercrime</li> <li>• FIB</li> <li>• FIU</li> <li>• SSA</li> <li>• ODPP</li> <li>• MOAGLA</li> </ul>	Follow-Up Counter Terrorism Investigations Training & Development Programme  Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT & Confiscation of Terrorist Property	September 10-21, 2018	Ministry of the Attorney General & Legal Affairs, Port of Spain	40	Completed
11.	William J. Perry Center For	The Caribbean Defense and Security Seminar	September 25-27, 2018	Port of Spain, Trinidad	30	Completed

No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
	Hemispheric Defense Studies	<ul style="list-style-type: none"> <li>• Strategic Leadership in Defense and Security Partnerships</li> <li>• Trinidad and Tobago's National Security Framework</li> <li>• Illicit finance and money laundering</li> <li>• Latin America and the Caribbean Defense and Security Panorama</li> </ul>				
12.	Strategic Services Agency (SSA)	Presentation on the Anti-Terrorism Act (inclusive of 2018 Amendments), FTFs and International Obligations re CT & Confiscation of Terrorist Property	October 9, 2018	Knowsley Building, Port of Spain	Approx. 20	Completed
13.	Trinidad and Tobago Coast Guard	Presentation on Money Laundering, Anti-Terrorism and Proliferation of Weapons of Mass Destruction Financing	April 9, 2019	Chaguaramas, Trinidad	Approx. 20	Completed
14.	Trinidad and Tobago Coast Guard	Presentation on Money Laundering, Anti-Terrorism and Proliferation of Weapons of Mass Destruction Financing.	April 10, 2019	Chaguaramas, Trinidad	Approx. 20	Completed
15.	Judicial Institute – Judicial Officers and Court Managers	Presentation on Anti-Terrorism and Proliferation of Weapons of Mass Destruction Financing entitled “Combating Terrorism: Legislative Interventions”	May 2019	Hall of Justice, Port of Spain, Trinidad	Approx. 78	Completed
16.	Team Nightingale – SSA, Children's Authority, FIB, FIU, Terrorist Interdiction Unit – Special Branch – TTPS, TTPS (Victim and Witness Support	Presentation on Anti-Terrorism, NPO (Non-Profit Organisations) and Terrorist Financing.	July 2019	Ministry of the Attorney General & Legal Affairs	Approx. 40	Completed



No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
	Unit, Child Protection Unit), Immigration, Ministry of Foreign and CARICOM Affairs, International Affairs Unit, Ministry of National Security, Foundation of Islamic Relief, Support and Training					
17.	Special Branch	Presentation on Anti-Money Laundering, Anti-Terrorism, NPOs and Proliferation of Weapons of Mass Destruction Financing	July 2019	SB Office, Agra Court, Agra Street, St. James	20	Completed
18.	CARICOM	Preventing Violent Extremism in CARICOM Member States - National Efforts to Prevent and Counter Terrorist Financing	July 23-25, 2019		Regional	Completed
19.	Fraud Squad	Presentation on Anti-Money Laundering, Anti-Terrorism, NPOs and Proliferation of Weapons of Mass Destruction Financing	July 24, 2019	SB Office Agra Court, Agra Street, St. James	10	Completed
20.	Customs & Excise	Presentation on Anti-Money Laundering, Anti-Terrorism, NPOs and Proliferation of Weapons of Mass Destruction Financing	August 16, 2019	Classroom #2, 6th Floor South, Customs House, Ajax Street, POS	30	Completed
21.	Immigration Division	Presentation on Anti-Money Laundering, Anti-Terrorism, NPOs and Proliferation of Weapons of Mass Destruction Financing.	August 23, 2019	Ajax Street, POS	20	Completed

No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
22.	University of the Southern Caribbean	Prioritising Caribbean Security in the 21st Century: Preventing Terrorism and Countering Violent Extremism Combatting Terrorism: Legislative Interventions on the Anti-Terrorism Act, Foreign Terrorist Fighters and International Obligations in Relation to Combatting Terrorism and Confiscation of Terrorist Property and Risk of NPO Abuse	October 2-3, 2019	USC Auditorium, Maracas Valley, St. Joseph	Regional	Completed
23.	2 <sup>nd</sup> Conference of Caribbean Directors of Public Prosecutions	The Role of the Prosecution Office in the Fourth Round CFATF Process – TF: The prosecutor's role and Trinidad & Tobago's experience	October 30 - November 1, 2019	The Hampton Inn Brickell, Miami, USA	25	Completed
24.	'Counter Financing of Terrorism (CFT)' Workshop - World Bank, FATF TREIN and CARIORUM	Trinidad and Tobago's Approach to Domestic Coordination and Assessing the Risk of Terrorist Financing	November 20, 2019	St. James's Club and Villas, Antigua and Barbuda	40	Completed
25.	Registrar General's Department	Anti-Terrorism Legislation, Proliferation Financing of Weapons of Mass Destruction and the application of Targeted Financial Sanctions	January 31, 2020	The Office of Attorney General and Ministry of Legal Affairs, Richmond St., Port of Spain.	5	Completed
26.	Financial Investigations Branch, TTPS	Understanding AML/CFT Compliance	March 2, 2020	Besson Street Police Station, Riverside Plaza, Port of Spain	16	Completed
27.	Financial Investigations Branch, TTPS	Terrorism	March 6, 2020	Besson Street Police Station, Riverside Plaza, Port of Spain	16	Completed



No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
28.	International Institute of Justice, Counter Terrorism Judicial Training	Key Aspects of the Trinidad and Tobago Anti-Terrorism Act, Chap. 12:07	March 10-11, 2020	Hall of Justice, Port of Spain, Trinidad	Approx. 40	Completed
29.	International Institute of Justice, Counter Terrorism Prosecutors Training	Key Aspects of the Trinidad and Tobago Anti-Terrorism Act, Chap. 12:07	March 12-13, 2020	Ministry of the Attorney General and Legal Affairs, Richmond Street, Port of Spain	Approx. 25	Completed
30.	Financial Investigations Branch, TTPS	Understanding AML/CFT Compliance	January 4, 2021	Virtual	Approx. 20	Completed
31.	Financial Investigations Branch, TTPS	Terrorism	January 8, 2021	Virtual	Approx. 20	Completed
32.	Ministry of Foreign Affairs and CARICOM	Designation of Individuals and Entities pursuant to s. 22B of the Anti-Terrorism Act, Chap. 12:07	February 10, 2021	Virtual	6	Completed
33.	United States Department of States International Narcotics and Law Enforcement, National Centre for State Courts, and Judicial Education Institute	Different Types of Orders- Financial Crimes	January 15, 2021	Virtual		Completed
34.	NM Leadership Consultant	Terrorism...Is it still a threat in the Caribbean? Have we dropped our guards too soon	March 16, 2021	Virtual	Regional	Completed
35.	SSA CT Conference	Protecting the Financial System and National Security- The AML/CFT Regime	June 23, 2021	Virtual	Regional Approx. 175	Completed

No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
36.	Airport Authority of Trinidad & Tobago, Trinidad and Tobago Police Service -Traffic Index, Trinidad and Tobago Police Service-Special Investigations Unit, Customs and Excise Division, Trinidad and Tobago Air Guard-Ulric Cross Station, Immigration Division, Trinidad and Tobago Civil Aviation Authority, JetBlue Airways, LIAT, Caribbean Airlines and United Airlines.	Counter Terrorism Training	November 11, 2021	Virtual	Approx. 25	Completed
37.	Sponsored by the U.S Department of State, Bureau of International Narcotics and Law Enforcement Affairs, conducted by the National Center for State Courts (NCSC)-Financial Crimes Team	Regional Civil Recovery Live Exercise	November 18, 2021-June 8, 2022	Virtual	Regional Participation	Completed
38.	FIB, TTPS	FIB Induction training on AML/CFT Compliance	March 3, 2022	Virtual		Completed
39.	FIB, TTPS	FIB Induction training on Terrorism	March 9, 2022	Virtual		Completed



No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
40.	United Nations Office on Drugs and Crime (UNODC)	Countering the Financing of Terrorism-UNSCR 1267 & 1988 Sanctions	March 15-18, 2022	In-Person		Completed
41.	United Nations Office on Drugs and Crime (UNODC)	Countering the Financing of Terrorism-UNSCR 1373 Sanctions	March 15-18, 2022	In-Person		Completed
42.	United Nations Office on Drugs and Crime (UNODC)	AML/CFT Financial Disruption Course	May 3-6, 2022	In-Person		Completed
43.	United Nations Office of Counter -Terrorism (UNOCT)	P/CVE Strategic and Reintegration Communication Co-Design Workshop	June 8-9, 2022	Virtual		Completed
44.	Sponsored by the Ministry of Commerce and the People's Republic of China and organized by the Central University of Finance and Economics (CUFE)	Regulatory Anti-Money Laundering & Countering the Financing of Terrorism	August 3-September 16, 2022	Virtual	International Participation	Completed
45.	AML Grey Matters presented by SILO Compliance Systems	Terror Finance 101: A Review of Historic and Emerging Terrorist Financing Models	September 8, 2022	Virtual		Completed
46.	Center for Policy Research, University at Albany, State University of New York (SUNY-Albany), funded by the U.S Department of State's Export Control and Related Border Security Program (EXBS)	Virtual Proliferation Financing Training for the Government of Trinidad and Tobago	September 22-23, 2022	Virtual		Completed

No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
47.	Task Force Nightingale	Key Aspects of the Trinidad and Tobago Anti-Terrorism Act, Chap. 12:07	October 11, 2022	In Person		Completed
48.	Sixteenth Meeting of the Open-ended Intergovernmental Working Group on Asset Recovery	Challenges With Respect to Beneficial Ownership and How it Can Foster and Enhance the Effective Recovery and Return of Proceeds of Crime, Taking Into Consideration Article 63 of the UNCAC	November 7-11, 2022	Vienna, Austria,	International Participation	Completed
49.	Task Force Nightingale	Comprehensive review of the Returnee Bill, 2023	March 31, 2023	Hybrid-Virtual and In-person		Completed
50.	Task Force Nightingale	Comprehensive review of the Returnee Bill, 2023	April 5, 2023	Virtual		Completed
51.	Financial Action Task Force, Risk, Trends and Methods Group (RTMG) Joint Experts Meeting	Caribbean Terrorism Financing Threats and Responses	April 5, 2023	New Delhi, India	FATF CFATF Members	Completed
52.	AML Grey Matters presented by SILO Compliance Systems	Proliferation Financing	May 24, 2023	Virtual		Completed
53.	George C. Marshall European Center for Security Studies Garmisch-Partenkirchen, Germany	Program on Terrorism and Security Studies (PTSS)	June 5-30, 2023	In Person	International participation	Completed
54.	University of the Southern Caribbean	International Conference on Security, Intelligence and Defence in the Caribbean	June 13, 2023	University of the Southern Caribbean, Maracas, St. Joseph	Regional Participation	Completed
55.	Ministry of Foreign and CARICOM Affairs	Designation of Individuals and Entities pursuant to s. 22B of the Anti-Terrorism Act, Chap. 12:07	June 28, 2023	Virtual	8	Completed



No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
56.	Regional Security System-Asset Recovery Unit	Regional Security System - Asset Recovery Unit's Financial Investigation and Asset Recovery Workshop - <i>Terrorist and Proliferation of Weapons Financing</i> ✓ <i>How to investigate Terrorist &amp; WMDs Financing</i> ✓ <i>Working to implement UNSCRs and other Sanctions</i> ✓ <i>Applying for Freezing Orders for terrorist groups and individuals</i>	October 11-13, 2023	Georgetown Guyana; presented virtually	Regional Participation	Completed
57.	Counter Terrorist Financing Overseas Territories Forum	Caribbean Terrorism Financing Threats and Responses for five (5) CFATF British Overseas Territories – Anguilla, Bermuda, British Virgin Islands, The Cayman Islands and the Turks & Caicos Islands	September 20-21, 2023	British Consulate, Miami, United States	Approx. 15	Completed
58.	EU AML/CFT Global Facility	'Risk and Consequence: The Future of FATF Recommendation 8 for Financial Integrity and for Civil Society' Global Conference	September 26-27, 2023	Hybrid – in person and Virtual	International Participation	Completed
59.	EU AML/CFT Global Facility	NPO Risk Assessment Workshop	October 31, 2023	Virtual	Approx. 15	Completed
60.	Financial Intelligence Unit, Belize	Virtual Workshop hosted by the FIU of Belize on the Designation of Individuals and Entities Pursuant to UNSCR 1373 (2001) - <i>The Implementation of Targeted Financial Sanctions related to Terrorism and Terrorist Financing: Trinidad &amp; Tobago's</i>	November 2, 2023	Virtual	Regional Participation	Completed

No.	ENTITY	COURSE	DATE	LOCATION	No. of Participants	Status
		<i>Domestic Framework</i>				

As outlined in the table above, the ATU, Office of the Attorney General and Ministry of Legal Affairs has continued to deliver training to law enforcement agencies on the provisions of the Anti-Terrorism Act, Chap. 12:07, with particular emphasis on terrorism offences, terrorist financing and confiscation of terrorist funds and the terrorist financing risks related to Non-profit Organizations.

Following the enactment of the Anti-Terrorism (Amendment) Act, 2018 in July 2018, this training has been updated to reflect the newly amended provisions of the Act. Priority has been given to agencies directly involved in the gathering of intelligence and evidence for the investigation of terrorism and terrorist financing with more than one thousand (1,000) individuals having been trained and/or presented on the ATA to date. In addition, the ATU has conducted training at various forums which were participated in via teleconference and videoconferences, thereby disseminating the relevant information to regional audiences in CARICOM.



**TABLE OF DOMESTIC DESIGNATIONS**

	Listed Entity & List of Offences	CV No. & Date of Order
1.	<b>Kareem Ibrahim</b> Section 12 - Recruitment Section 17 - Bombing offences.	CV2015 - 04040 December 3, 2015
2.	<b>Abdul Kadir</b> Section 5 - Collection or provision of property to commit terrorist acts Section 12 - Recruitment Section 17- Bombing offences. Section 22A- Terrorism Financing	CV2017 - 00471 February 9, 2017
3.	<b>Abdel Nur</b> Section 5 - Collection or provision of property to commit terrorist acts Section 17- Bombing offences. Section 22A - Terrorism Financing	CV2017- 00472 February 9, 2017
4.	<b>Russell Defreitas</b> Section 5 - Collection or provision of property to commit terrorist acts Section 12 - Recruitment Section 17- Bombing offences. Section 22A - Terrorism Financing	CV2017- 00473 February 9, 2017
5.	<b>Shane Dominic Crawford</b> S. 9- Support S.12- Recruitment S.14- Inciting or Promoting the Commission of a Terrorist Act	CV2017- 01081 March 31, 2017
6.	<b>Milton John Algernon</b> S. 9- Support S.12- Recruitment	CV2017- O1973 June 12, 2017

	Listed Entity & List of Offences	CV No. & Date of Order
	S.13- Conducting Training S.14- Inciting or Promoting the Commission of a Terrorist Act	
7.	<b>Enraan Ali</b> S. 4- Providing of Servicers for the Commission of a Terrorist Act S. 9- Support S.11- Provision of Devices S.12- Recruitment S.13A- Attending or Receiving Training to Commit a Terrorist Act S.15A- Traveling for the purpose of committing a Terrorist Act	CV2020-04440 December 21, 2020
8.	<b>Zaid Abdul Hameed</b> S. 9- Support S.13A- Attending or Receiving Training to Commit a Terrorist Act S.15A- Traveling for the purpose of committing a Terrorist Act	CV2021- 04406 December 6 2021
9.	<b>Jihad Muhammad Ali</b> S. 9- Support S.13A- Attending or Receiving Training to Commit a Terrorist Act S.15A- Traveling for the purpose of committing a Terrorist Act	CV2023- 01133 April 13, 2023



**Executive Summary of Annual Report for 2022-2023**

The **Annual Report** of the Anti-Terrorism Unit, Office of the Attorney General and Ministry of Legal Affairs for the fiscal year October 2022 to September 2023 is presented pursuant to Section 38B(2) of the Anti-Terrorism Act, Chapter 12:07.

The Annual Report provides all of the key achievements of the Anti-Terrorism Unit (ATU), Office of the Attorney General and Ministry of Legal Affairs which was established in accordance with the Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit of Trinidad and Tobago) Act No. 20 of 2018. The core objective of the Anti-Terrorism Unit is to efficiently carry out the functions of the Attorney General pursuant to the Anti-Terrorism Act, Chapter 12:07 (ATA).

Section 38B(2) of the ATA provides that the functions of the Attorney General under the Act may be exercised by the Attorney General in person or through a public officer or legal officer who is employed in the Unit. Primarily, the ATU implements key sections of the Act by making applications to the High Court for the designation of individuals and entities, both domestically and detailed on various United Nations Security Council Sanctions Lists, and the application of Targeted Financial Sanctions in Trinidad and Tobago. The ATU also works closely with key national agencies relative to Counter Terrorism matters as well as with our international partners and non-profit organisations on preventing and countering violent extremism.

This Report is vital to the role of the ATU in the fulfilment of the country's obligations pursuant to international standards in respect of combatting terrorism as a member State of both the United Nations and the Caribbean Financial Action Task Force (CFATF). In the execution of these responsibilities, the ATU continues to work closely with the Financial Action Task Force (FATF) and the Caribbean Financial Action Task Force (CFATF) in maintaining Trinidad and Tobago's Anti-Money Laundering/Combating the Financing of Terrorism/Combating Proliferation Financing (AML/CFT/CPF) regime and in order to bring about legislative and regulatory reforms in these areas. The Government of the Republic of Trinidad and Tobago has ensured overall and

complete restructure of this country's AML/CFT/CPF regime in tandem with the national risk and in compliance with international standards set by the FATF and CFATF.

For the period noted above, the ATU has accomplished numerous achievements which aim to ensure that our financial system and national security would be less vulnerable to threats posed by Terrorists and Money Launderers. Some of those achievements are as follows:

1. The ATU has successfully designated all new additions to the various United Nations Security Council Sanctions Lists and has also delisted those that were removed from the said Lists. Additionally, the ATU has attained a total of nine (9) domestic designations of individuals pursuant to UNSCR 1373(2001). In light of the foregoing, the ATU has obtained a total of one hundred and fifty (150) orders from the High Court pursuant to section 22B of the Act, with a total of four hundred and ninety-one (491) individuals and entities currently designated as listed entities and their assets frozen.
2. The ATU has continued to deliver training to law enforcement and competent agencies on the provisions of the ATA, as well as delivering presentations to key Committees and Task Forces in Trinidad and Tobago in respect of Countering Terrorism and Terrorism Financings within the remit of the ATA;
3. Trinidad and Tobago has submitted its 6<sup>th</sup> Follow Up Report to the Caribbean Financial Action Task Force (CFATF) in relation to which the ATU contributes significantly;
4. Pursuant to Cabinet Note No. AGLA(20)102, the Anti-Money Laundering/Combatting the Financing of Terrorism (AML/CFT) Compliance Unit previously under the Ministry of National Security now falls under the purview of the ATU;
5. The Miscellaneous Provisions (FATF Compliance) Act, No. 25 of 2020 amended the Anti-Terrorism Act, Chap. 12:07. Act No. 25 of 2020 was partially proclaimed by Legal Notice No. 409, No. 39 of 2020 on December 22, 2020 and gave effect to the following changes in the Anti-Terrorism Act:



- i. The creation of a new subsection under Section 22B of the Act to allow for applications under subsection (1A) to be filed under seal; and
- ii. The creation of a new Section 44, which addresses Confidentiality of Information under the purview of the ATU.

These changes will assist with gathering further information in respect of designations, ensuring that evidence to be used in subsequent prosecutions is not compromised and that confidentiality is maintained.

6. The ATU also implements TFS related to Proliferation to meet our international obligations pursuant to FATF Recommendation 7 and Immediate Outcome 11, as well as the mandates of UNSCR 1718 (2006) and 2231(2015). It is recognised that the use of TFS is an important means to deprive proliferation financiers of their funds, thereby protecting citizens from the threats of crime, terrorism and weapons of mass destruction. As such, these measures are continuously maintained and applied so as to financially disrupt and guard against potential proliferation financing attempts.
7. In order to meet the mandates of UNSCR 2653(2022) and the UNSC Sanctions Regime on Haiti, which relates to the Program of Action (POA) to prevent, combat and eradicate the illicit trade in small arms and light weapons, the Economic Sanctions (Implementation of United Nations Security Council Resolution 2653(2022) on the Republic of Haiti) Order, 2023 was established pursuant to the Economic Sanction Act, Chap. 81:05. In alignment with the GORTT's commitment towards doing its part to ensure the restoration of peace, security and stability for Haiti by upholding the implementation of this UNSCR, the ATU has since applied to the High Court for Orders to designate all five (5) individuals on the UNSC 2653 Sanctions List and have their assets frozen. The relevant orders were successfully granted and TFS have been implemented.
8. Further to the foregoing, Trinidad and Tobago is in the process of finalising the Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism, Financial Intelligence Unit of Trinidad and Tobago, Securities, Insurance, Non-Profit Organisations and Miscellaneous Provisions [FATF Compliance]) Bill, 2023. In this regard, the ATU plays

an essential role in the revision of legislation, policies and procedures relative to rectifying deficiencies in our AML/CFT Framework to meet the FATF Standards.

9. Additionally, the ATU is working closely with other entities to drive a suite of amendments to legislation to meet our international obligations as set out by the Global Forum on Transparency and Exchange of Information for Tax Purposes via the Miscellaneous Provisions (Trustees, Exchequer and Audit Act, the Minister of Finance (Incorporation) Act, Proceeds of Crime, Income Tax, Companies, Partnerships, Securities, Tax Information Exchange Agreements, the Non-Profit Organisations and Mutual Administrative Assistance in Tax Matters) Bill, 2023
10. The CARICOM Implementation Agency for Crime and Security (IMPACS) through funding from the 11<sup>th</sup> European Development Fund is working closely with key entities in Trinidad and Tobago, including the ATU to develop updated API/PNR model legislation as well as guidance documents outlining the requirements to implement the API/PNR legislation within Trinidad and Tobago and at the CARICOM Implementation Agency for Crime and Security (IMPACS) through the sub-agency of the Joint Regional Communications Centre (JRCC).

The ATU continues to work rigorously on various ongoing matters with our domestic, regional and international counterparts and on the continuous implementation of the ATA.